



BOULT • CUMMINGS  
CONNERS • BERRY PLC

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T.R.A. DOCKET ROOM

October 27, 2003

Honorable Deborah Taylor Tate  
Chairman  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

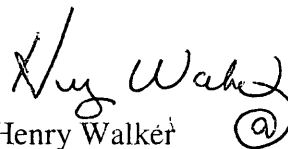
Re: Implementation of the Federal Communications Commission's Triennial  
Review Order-9 Month Proceeding-Switching  
Docket No. 03-00491

Dear Chairman Tate:

Enclosed please find the original and fourteen (14) copies of AT&T's First Set of Interrogatories and First Request for Production of Documents to BellSouth Telecommunications Inc. in the above-captioned proceeding.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:   
Henry Walker

HW/nl

c: Guy Hicks, BellSouth Telecommunications, Inc.

**BEFORE THE TENNESSEE REGULATORY AUTHORITY**

**NASHVILLE, TENNESSEE**

**October 27, 2003**

IN RE:

IMPLEMENTATION OF THE FEDERAL	)	
COMMUNICATIONS COMMISSION'S	)	DOCKET NO.
TRIENNIAL REVIEW ORDER – 9 MONTH	)	03-00491
PROCEEDING – SWITCHING	)	

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**AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, LLC'S  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS (NOS. 1-31)  
TO BELL SOUTH TELECOMMUNICATIONS, INC.**

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AT&T Communications of the South Central States, LLC ("AT&T"), pursuant to the Tennessee Regulatory Authority's Procedural Schedule issued in this docket on October 13, 2003, hereby serves its Request for Production of Documents to BellSouth Telecommunications, Inc. ("BellSouth"). Also pursuant to the Procedural Schedule, AT&T requests that the following documents be made available for inspection and copying in the AT&T office located at 1200 Peachtree Street, NE, Suite 8100, Atlanta, Georgia, on or before November 24, 2003 or at such time and place as may be mutually agreeable to counsel. In lieu of production for inspection, upon agreement of counsel, BellSouth may provide copies of all responsive documents to AT&T at the address noted above on or before November 24, 2003.

**DEFINITIONS**

1. "BellSouth" means BellSouth Telecommunications, Inc. and its parents, subsidiaries, and affiliates, their present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of BellSouth.

2. The terms "you" and "your" refer to BellSouth.
3. "AT&T" means AT&T Communications of the South Central States, LLC, their present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of AT&T.
4. The term "person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.
5. The term "document" shall have the broadest possible meaning under applicable law. "Document" means every writing or record of every type and description that is in the possession, custody or control of BellSouth, including, but not limited to, correspondence, memoranda, drafts, work papers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail files; and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" further includes, by way of illustration and not limitation, schedules, progress schedules, time logs, drawings, computer disks, charts projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.
6. The term "referring or relating to" means any oral, graphic, demonstrative, telephonic, verbal, electronic, written or other conveyance of information, including, but not limited to, conversations, telecommunications and documents.
7. The term "referring or relating to" means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving,

dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

8. “And” and “or” as used herein shall be construed both conjunctively and disjunctively and each shall include the other whenever such construction will serve to bring within the scope of these discovery requests and information what would not otherwise not be brought within their scope.

9. The singular as used herein shall include the plural and the masculine gender shall include the feminine and the neuter.

10. “Hot cut” refers to the entire process necessary to physically transfer from one carrier to another a working voice grade access line that remains working after the transfer.

11. “Bulk Hot Cut” refers to any hot cut(s) performed by BellSouth in which multiple customers of a CLEC are migrated to the CLEC or to a different network configuration (UNE-P to UNE-L), and managed by BellSouth as a joint migration event or project.

12. “Individual Hot Cut” refers to all hot cuts that are not bulk hot cuts.

13. “Access Line” refers to a working analogue voice grade access line used to serve residential and small business customers, or a working voice grade line served by Digital Loop Carrier Systems (“DLC”) that is used for serving residential and small business customers. “Access Line” does not, for example, include high capacity systems such as DS1 and ISDN-PRI.

14. Unless otherwise stated, information requests refer to BellSouth’s entire nine-state region.

15. Digital Loop Carrier (“DLC”) includes IDLC (integrated) UDLC (Universal) and NGDLC (Next Generation).

16. "CLEC" means a "competitive local exchange carrier," as defined in 47 U.S.C. § 153(26), which is not an "incumbent local exchange carrier" as defined in 47 U.S.C. § 251(h).
17. "ILEC" refers to Incumbent Local Exchange Carrier.
18. "CO" refers to Central Office.
19. "Coordinated cut over" refers to coordination of the loop migration from the ILEC switch to the CLEC switch.
20. "Coordinated time-specific cut over" refers to coordination of the loop migration from the ILEC switch to the CLEC switch at a time specified by the CLEC and agreed to by the ILEC.
21. "CWINS" refers to Customer Wholesale Interconnection Services.
22. "FCC" refers to the Federal Communications Commission.
23. "LCSC" refers to Local Carrier Service Center.
24. "MDF" refers to Main Distribution Frame.
25. "UNE-L" refers to Unbundled Network Element-Loop.
26. "UNE-P" refers to Unbundled Network Element –Platform.
27. "1996 Telecom Act" refers to the Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56.

### **INSTRUCTIONS**

1. If you contend that a document in response to any document request may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such document in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:

- a) the privilege asserted and its basis;
- b) the nature of the information withheld;
- c) the subject matter of the document, except to the extent that you claim it is privileged.

2. These discovery requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These discovery requests are intended to include requests for information which is physically within BellSouth's possession, custody or control as well as in the possession, custody or control of BellSouth's agents, attorneys, or other third parties from which such documents may be obtained.

3. If any document request cannot be fully complied with, comply to the extent possible and specify the reasons for your inability to comply fully.

4. These document requests are continuing in nature and require supplemental responses should additional documents become available.

### **REQUESTS FOR PRODUCTION OF DOCUMENTS**

- 1) Please produce all documents describing, outlining, or memorializing the process described in BellSouth's response to Interrogatory No. 2. Documents should include BellSouth's internal documents and all documents available to CLECs.
- 2) Please produce all internal and external documentation, work papers, test related documents, test results, and analysis in BellSouth's response to Interrogatory No. 3.
- 3) With regard to BellSouth's response to Interrogatory No. 6, please provide all documents describing or discussing the limits or the decision to impose such limits. Documents should include BellSouth's internal documents and all documents available to CLECs.

- 4) With regard to BellSouth's response to Interrogatory No. 7, please provide all documents describing or discussing the limits or the decision to impose such limits. Documents should include BellSouth's internal documents and all documents available to CLECs.
- 5) Please produce the supporting work papers used in calculating or estimating the percentage described in BellSouth's response to Interrogatory No. 26.
- 6) Please provide a copy of all documents describing the BellSouth processes identified in BellSouth's response to Interrogatory No. 36.
- 7) Provide all methods and procedures documents, job aids and other materials provided to BellSouth personnel to use to process service requests for and to provision:
  - (a) Individual hot cuts of loop and number portability.
  - (b) Bulk migrations from UNE-P to UNE-L.

Such documents should include materials provided to BellSouth personnel in the CWINS Center, Central Office, field installation personnel and the LCSC.

- 8) Provide a copy of BellSouth's Network Centers Force Sizing Model Process and Force Models, and all associated instructions.
- 9) Provide a copy of all methods and procedures and other documents used to plan and manage the work schedules of CO and field technicians.

- 10) Provide copies of all documents which describe the process by which BellSouth processes multiple vendor orders, e.g. a CLEC using one wholesale provider for switching and another for the loop. Documents should include BellSouth's internal documents and all documents available to CLECs.
- 11) With regard to the documents referenced in Interrogatory No. 43, please provide such records, organized by the CO location in which the recorded work occurred. Please also provide any documentation that contains descriptions or instructions concerning these logs, studies, or records.
- 12) Provide copies of all analysis and work papers used to support the information contained on page 7 of BellSouth's Ex Parte in FCC Docket 01-338 filed December 24, 2002 (Page is entitled "Conversion of the Embedded UNE-P Base – Top 20 UNE-P Wire Centers").
- 13) In the Affidavit of Kenneth L. Ainsworth and W. Keith Milner filed by BellSouth in FCC Docket 01-388 on July 17, 2002, at Paragraph 41, BellSouth states that "...anywhere from 2 to 10 (or more) central office technicians may be at work simultaneously on the same MDF with no negative impact on productivity". Please provide all work papers, analysis, studies, reports, etc. that BellSouth relied upon as the basis for this statement.
- 14) With respect to the Coordinated Hot Cut Timeliness % Within Interval Measure, please provide all documents containing or pertaining to performance data, studies, or other information that support the benchmark of 95% within 4 hours window for IDLC loops.



- 15) Provide all documents that refer, relate to, or discuss the loop cutover volume capacity or through-put capability of the current BellSouth network in BellSouth's entire nine-state region and all documents that refer, relate to, analyze, or discuss how BellSouth believes such capacity/capability may be increased.
- 16) Referring to Interrogatory No. 50, produce all documents substantiating any assertion that an unaffiliated competitive switch provider qualifies as a wholesale provider and the product, customer and geographic market served by such wholesale provider.
- 17) Referring to Interrogatory No. 50, produce all documents substantiating any assertion that a non-ILEC wholesale circuit switching provider is operationally ready to provide wholesale switching and that such provider and BellSouth have procedures in place to enable a carrier purchasing a BellSouth analog loop to provide service of equivalent quality using another non-ILEC carrier's switch.
- 18) Referring to Interrogatory No. 50, provide any documents, information, notes, work papers, or communications from the identified company in BellSouth's possession or control relating to the identified company's ability, intent, desire, or willingness to provide or to make available wholesale unbundled local switching to CLECs.
- 19) Referring to Interrogatory No. 52, produce all documents substantiating any assertion that an unaffiliated competitive switch provider qualifies as a self-provider and the product, customer and geographic market served by such self-provider.

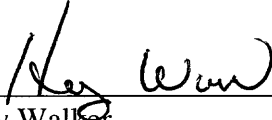
- 20) Referring to Interrogatory No. 52, provide any documents, information, notes, work papers, or communications from the identified company in BellSouth's possession or control relating to the identified company's ability, intent, desire, or willingness to provide or to make available wholesale unbundled local switching to CLECs.
- 21) Referring to Interrogatory No. 71, if the answer to (c) is in the affirmative, produce all documents that refer, relate to, or discuss BellSouth's consideration of off-loading such lines to a different local switch.
- 22) Referring to Interrogatory No. 72, if the answer to (a) is in the affirmative, please produce a copy of BellSouth's switch engineering guidelines.
- 23) Referring to Interrogatory No. 73, please produce all documents describing BellSouth's FAR guidelines.
- 24) Provide all internal documents that refer, relate to, or discuss the profitability of BellSouth engaging in UNE-based competition to serve residential and/or business customers served by analog loops (hereinafter "mass-market customers") in any out-of-region area.
- a) Identify each operational and economic factor BellSouth believes is appropriate to consider in making a determination whether to implement, continue, expand or curtail any out-of-region local market entry strategy.
  - b) Provide all documents that refer or relate to any operational or economic issue BellSouth has encountered in any effort BellSouth has made to implement or expand its out-of-region local market entry strategy.

- 25) Provide all documents that analyze out-of-region local market entry that have been reviewed, considered, or evaluated by BellSouth regarding entry to serve “mass-market” retail customers using self-provided switching since passage of the 1996 Telecom Act.
- 26) Provide all documents that refer, relate to, or discuss the examination or consideration by BellSouth whether to lease switching capacity from others as part of its out-of-region local market entry strategy to serve “mass-market” customers.
- 27) Provide all documents that refer, relate to, or discuss the examination or consideration by BellSouth of offering wholesale switching in any out-of-region local market.
- 28) Provide all documents analyzing or describing any external “market” for leased local switching capacity that BellSouth reviewed in evaluating its proposed pricing for de-listed local switching to serve voice grade loops. If no documents were reviewed, explain how BellSouth established its prices for de-listed local switching was established.
- 29) Provide any and all market surveys conducted or other documents and information reviewed by BellSouth that discuss or address:
  - a) Pricing strategies of competitors offering local switching.
  - b) Product descriptions of competitors’ offerings of local switching for mass-market customers.
  - c) Demand elasticity for local switching.
  - d) Demand projections related to the market for local switching.
  - e) Marketing strategies used by competitors offering local switching to serve mass-market customers.
- 30) Referring to Interrogatory No. 103, please provide a copy of all documents describing BellSouth processes identified.

- 31) Referring to Interrogatory No. 108, please produce all documents referring or relating to any strategic behavior (pricing offers, advertising campaigns, packaged offerings, waiver of fees, term contract offerings, marketing strategies) BellSouth has evaluated or implemented in consideration of one or more CLEC's planned or actual entry into a local service market.

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

  
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Attorneys for AT&T Communications of the  
South Central States, LLC

**BEFORE THE TENNESSEE REGULATORY AUTHORITY**

**NASHVILLE, TENNESSEE**

**October 27, 2003**

IN RE:

IMPLEMENTATION OF THE FEDERAL	)	
COMMUNICATIONS COMMISSION'S	)	DOCKET NO.
TRIENNIAL REVIEW ORDER – 9 MONTH	)	03-00491
PROCEEDING – SWITCHING	)	

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**AT&T COMMUNICATION OF THE SOUTH CENTRAL STATES, LLC'S  
FIRST SET OF INTERROGATORIES (NOS. 1-112)  
TO BELL SOUTH TELECOMMUNICATIONS, INC.**

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AT&T Communications of the South Central States, LLC ("AT&T"), pursuant to the Tennessee Regulatory Authority's Procedural Schedule issued in this proceeding on October 13, 2003, hereby serves its First Set of Interrogatories to BellSouth Telecommunications, Inc. ("BellSouth").

**DEFINITIONS**

1. "BellSouth" means BellSouth Telecommunications, Inc., and its parents, subsidiaries, and affiliates, their present and former officers, employees, agents, representatives, directors, and all other persons acting or purporting to act on behalf of BellSouth Telecommunications, Inc.

2. The terms "you" and "your" refer to BellSouth.

3. "CLEC" means a "competitive local exchange carrier," as defined in 47 U.S.C. § 153(26), which is not an "incumbent local exchange carrier" as defined in 47 U.S.C. § 251(h).

4. "AT&T" means AT&T Communications of the South Central States, LLC, its subsidiaries and affiliates, their present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of AT&T.

5. The term "person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

6. The term "document" shall have the broadest possible meaning under applicable law. "Document" means every writing or record of every type and description that is in the possession, custody or control of BellSouth, including, but not limited to, correspondence, memoranda, drafts, workpapers, summaries, stenographic or handwritten notes, studies, publications, books, pamphlets, reports, surveys, minutes or statistical compilations, computer and other electronic records or tapes or printouts, including, but not limited to, electronic mail files; and copies of such writings or records containing any commentary or notation whatsoever that does not appear in the original. The term "document" further includes, by way of illustration and not limitation, schedules, progress schedules, time logs, drawings, computer disks, charts, projections, time tables, summaries of other documents, minutes, surveys, work sheets, drawings, comparisons, evaluations, laboratory and testing reports, telephone call records, personal diaries, calendars, personal notebooks, personal reading files, transcripts, witness statements and indices.

7. The term "communication" means any oral, graphic, demonstrative, telephonic, verbal, electronic, written or other conveyance of information, including, but not limited to, conversations, telecommunications and documents.

8. The term "referring or relating to" means consisting of, containing, mentioning, suggesting, reflecting, concerning, regarding, summarizing, analyzing, discussing, involving,

dealing with, emanating from, directed at, pertaining to in any way, or in any way logically or factually connected or associated with the matter discussed.

9. "And" and "or" as used herein shall be construed both conjunctively and disjunctively and each shall include the other whenever such construction will serve to bring within the scope of these discovery requests any information that would otherwise not be brought within their scope.

10. "Affiliate" or "affiliated" means an entity that directly, or indirectly through one or more intermediaries, controls, or is controlled by, or is under common control with, another entity.

11. The singular as used herein shall include the plural, and vice versa, and the masculine gender shall include the feminine and the neuter.

12. "Identify" or "identifying" or "identification" when used in reference to a natural person means to state:

- a) the full legal name of the person;
- b) the name, title and employer of the person at the time in question;
- c) the present or last known employer of such person;
- d) the present or last known home and business addresses of the person; and
- e) the present home address.

13. "Identify" or "identifying" or "identification" when used in reference to a person other than a natural person means to state:

- a) the full name of the person and any names under which it conducts business;
- b) the present or last known address of the person; and

c) the present or last known telephone number of the person.

14. "Identify" or "identifying" or "identification" when used in reference to a document means to provide with respect to each document requested to be identified by these discovery requests a description of the document that is sufficient for purposes of a request to produce or a subpoena duces tecum, including the following:

- a) the type of document (e.g., letter, memorandum, etc.);
- b) the date of the document;
- c) the title or label of the document;
- d) the Bates number or other identifier used to number the document for use in litigation;
- e) the identity of the originator;
- f) the identity of each person to whom it was sent;
- g) the identity of each person to whom a copy or copies were sent;
- h) a summary of the contents of the document;
- i) the name and last known address of each person who presently has possession, custody or control of the document; and
- j) if any such document was, but is no longer, in your possession, custody or control or is no longer in existence, state whether it: (1) is missing or lost; (2) has been destroyed; or (3) has been transferred voluntarily or involuntarily, and, if so, state the circumstances surrounding the authorization for each such disposition and the date of such disposition.

15. "Identify," "identifying" or "identity" when used in reference to a communication means to state the date of the communication, whether the communication was written or oral,



the identity of all parties and witnesses to the communication, the substance of what was said and/or transpired and, if written, the identity of the document(s) containing or referring to the communication.

16. “Hot cut” refers to the entire process necessary to physically transfer from one carrier to another a working voice grade access line that remains working after the transfer.

17. “Bulk Hot Cut” refers to any hot cut(s) performed by BellSouth in which multiple customers of a CLEC are migrated to the CLEC or to a different network configuration (UNE-P to UNE-L), and managed by BellSouth as a joint migration event or project.

18. “Individual Hot Cut” refers to all hot cuts that are not bulk hot cuts.

19. “Access Line” refers to a working analogue voice grade access line used to serve residential and small business customers, or a working voice grade line served by Digital Loop Carrier Systems (“DLC”) that is used for serving residential and small business customers. “Access Line” does not, for example, include high capacity systems such as DS1 and ISDN-PRI.

20. Digital Loop Carrier (“DLC”) includes IDLC (integrated) UDLC (Universal) and NGDLC (Next Generation).

21. “ILEC” refers to Incumbent Local Exchange Carrier.

22. “CLLI code” refers to Common Language Location Identifier.

23. “CO” refers to Central Office.

24. “Coordinated cut over” refers to coordination of the loop migration from the ILEC switch to the CLEC switch.

25. “Coordinated time-specific cut over” refers to coordination of the loop migration from the ILEC switch to the CLEC switch at a time specified by the CLEC and agreed to by the ILEC.

26. "CWINS" refers to Customer Wholesale Interconnection Services.
27. "DSO" refers to Digital Signal, level zero.
28. "FCC" refers to the Federal Communications Commission.
29. "LCSC" refers to Local Carrier Service Center.
30. "LSR" refers to Local Service Request.
31. "MDF" refers to Main Distribution Frame.
32. "OSS" refers to Operational Support Systems.
33. "PIC" refers to Primary Interexchange Carrier.
34. "SEEM" refers to Self Effectuating Enforcement Mechanism.
35. "UNE" refers to Unbundled Network Element.
36. "UNE-L" refers to Unbundled Network Element-Loop.
37. "UNE-P" refers to Unbundled Network Element –Platform.
38. "LIDB" refers to Line Information Database.
39. "MSA" refers to Metropolitan Statistical Area.
40. "LATA" refers to Local Access and Transport Area.
41. Unless otherwise stated, information requests refer to BellSouth's nine-state region.

### **GENERAL INSTRUCTIONS**

1. If you contend that any response to any Interrogatory may be withheld under the attorney-client privilege, the attorney work product doctrine or any other privilege or basis, please state the following with respect to each such response in order to explain the basis for the claim of privilege and to permit adjudication of the propriety of that claim:

- a) the privilege asserted and its basis;

- b) the nature of the information withheld; and
- c) the subject matter of the document, except to the extent that you claim it is privileged.

2. These discovery requests are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These discovery requests are intended to include requests for information, which is physically within your possession, custody or control as well as in the possession, custody or control of your agents, attorneys, or other third parties from which such documents may be obtained.

3. If any Interrogatory cannot be answered in full, answer to the extent possible and specify the reasons for your inability to answer fully.

4. These interrogatories are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these interrogatories subsequently become known.

5. For each Interrogatory, provide the name of the company witness(es) or employee(s) responsible for compiling and providing the information contained in each answer.

6. To the extent BellSouth has previously provided a response to any Interrogatory, which prior response is responsive to any of the following Interrogatories, in BellSouth's nine-state region or any other state in proceedings in which BellSouth and AT&T are parties, BellSouth need not respond to such Interrogatory again, but rather may respond to such Interrogatory by identifying the prior response to such Interrogatory by state, proceeding, docket number, date of response, and the number of such response. If such prior response does not respond to the Interrogatory contained below in its entirety, you should provide all additional information necessary to make your answers to these Interrogatories complete.

## INTERROGATORIES

- 1) Please provide, in table format, the following information for each BellSouth host or remote CO in BellSouth's nine-state region:
  - (a) CLLI code;
  - (b) address;
  - (c) city or town;
  - (d) whether the CO is staffed full time (i.e., during regular business hours), part-time (and if so on what basis), or unstaffed; and
  - (e) whether the switch within the CO is a remote switch, and if so identify the associated host switch.
  
- 2) Does BellSouth have a "bulk" hot cut process for moving UNE-P customers to UNE-L? If your answer is in the affirmative:
  - a) Describe the most currently available process in detail.
  - b) What are the dates the most currently available process was:
    - (i) created;
    - (ii) tested; and
    - (iii) implemented.
  
- 3) Has BellSouth's "bulk" hot cut process been subjected to testing, third-party or otherwise? If so, please provide the detailed results of such testing, including all documentation of the methodology that substantiates the statistical and operational validity of such testing.

4) For each day between August 1, 2000 and August 1, 2003, or for the latest period in which this information is available, and for each CO identified in the answer to Interrogatory No. 1, please provide the number of access lines transferred by BellSouth via:

- (a) Any hot cut method;
- (b) An individual hot cut method. For transfers made via this method please provide:
  - (i) the total number of access lines transferred;
  - (ii) the total number of BellSouth retail access lines transferred to UNE-L;
  - (iii) the total number of UNE-P access lines transferred to UNE-L; and
  - (iv) the total number of service resale access lines transferred to UNE-L.
- (c) A bulk hot cut method. For transfers made via this method please provide:
  - (i) the total number of batches transferred and the number of access lines transferred in each batch;
  - (ii) the total number of batches of BellSouth retail access lines transferred to UNE-L and the number of BellSouth retail access lines in each batch of BellSouth retail access lines transferred to UNE-L;
  - (iii) the total number of batches of UNE-P access lines transferred to UNE-L and the number of UNE-P access lines in each batch of UNE-P access lines transferred to UNE-L; and
  - (iv) the total number of batches of service resale access lines transferred to UNE-L and the number of service resale access lines in each batch of service resale access lines transferred to UNE-L.

If BellSouth cannot provide this information on a daily basis, but can provide it organized by some other time period (e.g. week, month, or quarter), please provide in that format. If BellSouth can provide the information for some COs or categories and not other COs or categories, please provide for the categories available and explain why information on other categories or COs is not available.

- 5) For what types of conversions to UNE-L does BellSouth require a field dispatch? For each month from August 2000 through August 2003, by CO, what percentage of orders converting service to UNE-L required a field dispatch?
- 6) Does BellSouth have a policy or practice of limiting the number of COs in which bulk hot cuts may occur in a single day or night? If your answer is in the affirmative:
- (a) Describe the policy in detail.
  - (b) Are limits established for a particular geographic area or areas within the BellSouth territory? If so, define the geographic areas for which such limits are established and explain the basis or reasons for these area definitions.
  - (c) Provide a detailed explanation for why these limits are being imposed.
- 7) Does BellSouth have a policy or practice of limiting the number of bulk hot cuts or bulk hot cut projects that may occur in a single day or night? If your answer is in the affirmative:
- (a) Describe the policy in detail.
  - (b) Are limits established for a particular geographic area or areas within the BellSouth territory? If so, define the geographic areas for which such limits are established and explain the basis or reasons for these area definitions.
  - (c) Provide a detailed explanation for why these limits are being imposed.
- 8) Please provide the maximum number of lines that can be converted (per day) to UNE-L using:
- (a) a "bulk" hot cut process per CO in BellSouth's nine-state region as a whole; and
  - (b) an individual hot cut process per CO in BellSouth's nine-state region.

- 9) Please specify the geographic area and the number of simultaneous COs in a given day in which a project hot cut can be performed in COs throughout BellSouth's nine-state region.
- 10) Are there COs in which BellSouth has never performed a hot cut? If yes, please identify those COs by reference to the list provided in the response to Interrogatory No. 1.
- 11) Provide the average time spent by BellSouth Central Office personnel who work directly on the Main Distribution Frame or other frames to conduct a single cutover on a single order, separated between each type or classification of cutover provided by BellSouth, including, but not limited to, "non-coordinated," "coordinated," "coordinated time-specific," or "bulk" cutovers, and explain how this was calculated.
- 12) Provide the average time spent by BellSouth Central Office personnel who work directly on the Main Distribution Frame or other frames to conduct multiple cutovers contained on a single order, separated between each type or classification of cutover provided by BellSouth, including, but not limited to, "coordinated," "coordinated time-specific," or "bulk" cutovers, and explain how this was calculated.
- 13) With regard to the current capacity of the individual or bulk hot cut process:
  - (a) Can it be increased, and if so, how?
  - (b) Does BellSouth have any current plans to increase the current capacity? If so, please describe such plans.
- 14) For each day between August 1, 2000 and August 1, 2003, or for the latest period in which this information is available, and for each CO identified in the answer to Interrogatory No. 1, please provide the number of UNE-P migration orders that have been completed by BellSouth.
- 15) What is the maximum number of UNE-P migration orders that can be completed in a given work day in each of BellSouth's COs?

- 16) What is the maximum number of UNE-P migration orders in **total** that can be completed in a given work day in BellSouth's COs in BellSouth's nine-state region?
- 17) For each day between August 1, 2000 and August 1, 2003, or for the latest period in which this information is available, and for each CO identified in the answer to Interrogatory No. 1, please separately provide the number of interLATA and intraLATA PIC changes processed by BellSouth.
- 18) What is the maximum number of long distance carrier changes that can be completed in a given work day in each of BellSouth's COs?
- 19) What is the maximum number of long distance carrier changes in **total** that can be completed in a given work day in BellSouth's COs in BellSouth's nine-state region?
- 20) Provide the number and percentage of DS0 level analog loops, by calendar year (for 2000-2003) and by CO (by applicable CLLI code), in BellSouth's nine-state region that are served by:
- (a) IDLC arrangements;
  - (b) NGDLC arrangements;
  - (c) UDLC arrangements;
  - (d) Entirely on copper; and
  - (e) Total.
- 21) Provide the number and percentage of access lines, by calendar year (for 2000-2003) and by CO (by applicable CLLI code) in BellSouth's nine-state region that serve:
- (a) small business lines; and
  - (b) residential lines.



- 22) Provide, by CO, or the next most granular analysis available, the most currently available average revenue per access line for small business lines and average revenue per access line for residential lines.
- 23) For the BellSouth access lines that are currently provisioned on IDLC/NGDLC technology as described in the response to Interrogatory No. 20 above, please state the percentage of such access lines for which BellSouth has existing, parallel copper or Universal Digital Loop Carrier ("UDLC") facilities available for hot cut conversions.
- 24) Provide the number of access lines served by DLC as described in the response to Interrogatory No. 20 above for which alternative copper loop facilities are currently not available.
- 25) Provide a forecast for the next five years, or the longest available forecast if a five-year forecast is not available, identifying the number and percent of loops in BellSouth's nine-state region that BellSouth intends to serve via:
- (a) DLC loop arrangements; and
  - (b) NGDLC loop arrangements.
- 26) Please identify the number and percent of hot cut LSRs received by BellSouth in the last 12 months for which data is available that have required a field dispatch to remove a customer from an access line(s) provisioned on an IDLC system.
- (a) If available, provide the information by month and by CO.
  - (b) Please explain how you calculated or estimated the percentage.
- 27) Please state the applicable charges, if any, and the amount of time it takes to transfer a customer's IDLC loop to:
- a) UDLC; and
  - b) spare copper.

- 28) For each month between August, 2000 and August, 2003, or for the latest period in which this information is available, (by state if available, if not, by region), what percent of total BellSouth retail to UNE-L orders were fully mechanized and required no manual intervention in BellSouth's ordering systems?
- (a) What percent of any fallout is returned to the CLEC for correction/resolution?
  - (b) What percent does BellSouth manually create in its OSS?
- 29) For each month between August, 2000 and August, 2003, or for the latest period in which this information is available, (by state if available, if not, by region), what percent of total BellSouth retail to UNE-L orders were fully mechanized and required no manual intervention in BellSouth's provisioning systems? Please categorize this percent by error type and by OSS (i.e., system name)
- 30) For each month between August, 2000 and August, 2003, or for the latest period in which this information is available, (by state if available, if not, by region), what percent of total BellSouth UNE-P to UNE-L orders were fully mechanized and required no manual intervention in BellSouth's ordering systems?
- (a) What percent of any fallout is returned to the CLEC for correction/resolution?
  - (b) What percent does BellSouth manually create in its OSS?
- 31) For each month between August, 2000 and August, 2003, or for the latest period in which this information is available, (by state if available, if not, by region), what percent of total BellSouth UNE-P to UNE-L were fully mechanized and required no manual intervention in BellSouth's provisioning systems? Please categorize this percent by error type and by OSS (i.e., system name)

- 32) For each month between August, 2000 and August, 2003, or for the latest period in which this information is available, (by state if available, if not, by region), what percent of total BellSouth retail to UNE-P orders were fully mechanized and required no manual intervention in BellSouth's ordering systems?
- (a) What percent of any fallout is returned to the CLEC for correction/resolution?
  - (b) What percent does BellSouth manually create in its OSS?
- 33) For each month between August, 2000 and August, 2003, or for the latest period in which this information is available, (by state if available, if not, by region), what percent of total BellSouth retail to UNE-P orders were fully mechanized and required no manual intervention in BellSouth's provisioning systems? Please categorize this percent by error type and by OSS (i.e., system name)
- 34) To what extent does the flow-through for Interrogatory Nos 28-33 above affect BellSouth's ability to increase the number of orders it can implement on a daily basis? Why or why not?
- 35) Does BellSouth have in place a single LSR process to migrate UNE loops from (a) BellSouth to CLEC, (b) CLEC to BellSouth and (c) CLEC to CLEC for each of the following
- (a) voice service,
  - (b) data service, and
  - (c) voice and data service

Please state whether the ordering process for each is fully electronic, partially electronic or manual

- 36) What processes does BellSouth have in place to handle orders that involve a CLEC using multiple vendors, e.g. a CLEC using one wholesale provider for switching and another for the loop, for its service arrangement? Is the ordering process fully electronic, partially electronic or manual?

- 37) If a CLEC uses one wholesale provider for switching and another for the loop, or otherwise uses multiple vendors in its service arrangement, does that service arrangement place any limitations, from BellSouth's perspective, on the CLEC's ability to use BellSouth's pre-ordering, ordering, and provisioning processes?
- 38) Please explain and list all system modifications made since 2000 that affect the flow through capabilities of the BellSouth OSSs used to process hot cut orders. Please explain and list all BellSouth OSS system modifications planned in anticipation of, and related to, the provisioning of bulk hot cuts.
- 39) Please explain how BellSouth's performance conducting bulk hot cuts is measured under the currently effective SEEM Plan, identifying each provision in SEEM upon which BellSouth relies for its answer.
- 40) Provide, for each individual CO, end office, and serving wire center
- (a) total collocation space,
  - (b) total collocation space currently occupied by carriers,
  - (c) names of carriers currently occupying collocation space,
  - (d) total collocation space held or occupied by carriers who are no longer operating, and
  - (e) total collocation space available for carriers
- 41) What is the maximum number of collocators at a remote terminal?
- 42) Provide the name(s) and title(s) of the person(s) responsible for writing and updating CO hot cut procedures, training, and job aids. Identify by name and title persons working on the task.

- 43) Does BellSouth have logs, studies or other records documenting the time required by its employees to complete all or some of the tasks associated with either the individual hot cut process or the bulk hot cut process? If yes, in what form does BellSouth maintain such records (e g electronically, on paper)? In addition, please list each task for which completion time is logged or recorded in a study
- 44) In BellSouth's Ex Parte in FCC Docket 01-338, filed December 24, 2002, on page 7, a table sets forth BellSouth's calculation of the time required to convert the "Top 20 UNE-P wire centers" to UNE-L or EELs Provide answers to the following questions regarding that table
- (a) How many technicians were planned to work per shift, per wire center, to accomplish these conversions?
  - (b) How many conversions were planned per technician, per shift in each of the twenty wire centers?
  - (c) What is the maximum amount of new migrations BellSouth would be able to complete during the 3 -9 months these conversions would take place?
  - (d) How many UNE-P customers exist in these 20 wire centers as of September 1, 2003?
- 45) In the Affidavit of Kenneth L Ainsworth and W Keith Milner filed by BellSouth in Docket 01-388 on July 17, 2002, at Paragraph 41, BellSouth states that " anywhere from 2 to 10 (or more) central office technicians may be at work simultaneously on the same MDF with no negative impact on productivity " With regard to that statement
- (a) Provide, by MDF and CO, the number of central office technicians that may work simultaneously on the same MDF with no negative impact on productivity
  - (b) Quantify how frequently this number of technicians "may work simultaneously on the same MDF with no negative impact on productivity"
- |     |       |
|-----|-------|
| i   | two   |
| ii  | three |
| iii | four  |
| iv  | five  |
| v   | six   |
| vi  | seven |

vii	eight
viii	nine
ix	ten
x	more than ten

- 46) Describe the impact, if any, that moving the current volume of UNE-P traffic onto UNE-L will have on BellSouth's tandem network/interconnection trunks?
- 47) Describe the impact, if any, that moving the volume of UNE-P traffic discussed in BellSouth's response to Interrogatory Nos 13, 15, and 16 onto UNE-L will have on BellSouth's tandem network/interconnection trunks?
- 48) Quantify any projected change in OSS charges anticipated with the implementation of a state approved batch hot cut process
- 49) What processes does BellSouth have in place with regard to directory listings, E911 and LIDB when a UNE-P loop is migrated to UNE-L?
  - (a) Are there capacity constraints?
  - (b) What is the process for ensuring the accuracy of the records?
- 50) Please identify any telecommunications companies (including ILECs or CLECs) that BellSouth has identified as being willing to provide, intending to provide, or currently making available wholesale unbundled local switching used in combination with unbundled analog loops obtained from BellSouth to CLECs
  - a) Identify by wire center each wholesale alternative to ILEC circuit switching and provide the basis upon which you believe such entity qualifies as a wholesale provider
  - b) Has BellSouth identified any vendors, other than any telecommunications company that are willing to offer switching capabilities to CLECs? If the answer is "yes," please provide name, address, and telephone number of each identified vendor

- 51) For each carrier listed in Interrogatory No 50, please provide for each switch BellSouth claims provides a wholesale alternative
- a) The 11-digit Common Language Location (“CLLI”) code of the switch as it appears in the Local Exchange Routing Guide (“LERG”), the vertical and horizontal (“V&H”) coordinates of the switch from the LERG, and claimed function of the switch (*e g* , stand-alone, host, or remote)
  - b) For each applicable CLLI code the associated LATA number, MSA number (if applicable), the V&H coordinates, the latitude and longitude (L&L) coordinates, the UNE loop rate zone, the special access density zone and whether interstate special access pricing flexibility is applicable for that end office
  - c) The location of each collocation arrangement that BellSouth claims is interconnected to the switch
  - d) The number of loops, by type (*i e* , analog UNE, DS-1 UNE, analog special access, DS-1 Special Access etc ) provisioned to each collocation
    - i) Within the last 3 months,
    - ii) Within the last 6 months, and
    - iii) Within the past year
  - e) The number of loops, by type (*i e* , analog UNE, DS-1 UNE, analog special access, DS-1 Special Access etc ) in-service at each collocation as of September 30, 2003
- 52) Identify by wire center in BellSouth’s nine-state region each unaffiliated competitive switch provider that BellSouth asserts qualifies as a self provider and detail the basis upon which you believe such entity qualifies as a self provider, including the geographic markets within which each unaffiliated competitive switch provider is providing service and the product and customer markets reached by each unaffiliated competitive switch provider
- a) Identify by wire center each wholesale alternative to ILEC circuit switching and provide the basis upon which you believe such entity qualifies as a self-provider

- 53) For each carrier listed in Interrogatory No 52, please provide for each switch BellSouth claims is used for self provisioning
- a) The 11-digit Common Language Location (“CLLI”) code of the switch as it appears in the Local Exchange Routing Guide (“LERG”), the vertical and horizontal (“V&H”) coordinates of the switch from the LERG, and claimed function of the switch (*e g* , stand-alone, host, or remote)
  - b) For each applicable CLLI code the associated LATA number, MSA number (if applicable), the V&H coordinates, the latitude and longitude (L&L) coordinates, the UNE loop rate zone, the special access density zone and whether interstate special access pricing flexibility is applicable for that end office
  - c) The location of each collocation arrangement that BellSouth claims is interconnected to the switch
  - d) The number of loops, by type (*i e* , analog UNE, DS-1 UNE, analog special access, DS-1 Special Access etc ) provisioned to each collocation
    - i) Within the last 3 months,
    - ii) Within the last 6 months, and
    - iii) Within the past year
  - e) The number of loops, by type (*i e* , analog UNE, DS-1 UNE, analog special access, DS-1 Special Access etc ) in-service at each collocation as of September 30, 2003
- 54) Identify any and all purposes for which BellSouth uses each of the following differentiations for operational, economic, or marketing purposes (1) LATA, (2) wire center, (3) MSA, (4) disaggregated geographic area for performance measurement data collection and reporting, (5) entire state, (6) entire service area, and (7) other level of differentiation (specify)



- 55) For the most recent quarter for which information is available, provide by applicable CLLI code the number of
- (a) Analog loops provided to competitive carriers with unbundled local switching (i.e., UNE-P lines),
  - (b) Analog loops provided to competitive carriers without unbundled local switching (UNE-L), and
  - (c) The number of CLECs who are collocated in that wire center and indicate the number of such CLECs who currently have analog (copper) cross connection capability to the BellSouth MDF, and
  - (d) The number of small business lines (based on DSO/DS1 cutoff) and number of residential lines
- 56) For the most recent quarter for which information is available, please provide by applicable CLLI code, the total number of retail access lines (voice grade equivalents) (VGEs) provided by BellSouth, as well as the number in each of the following categories
- a) residential,
  - b) business,
  - c) Centrex,
  - d) PBX,
  - e) Public, and
  - f) Small business premises with four or more analog switched lines
- 57) Please list those wire centers that are in Special Access Loop Density Zone #1 pursuant to FCC regulations
- 58) Do you have space for additional collocators in every wire center? List those wire centers in which you cannot accommodate at least 3 more collocators

- 59) Provide the number of EELs in service in BellSouth's nine-state region at the end of the most recent quarter for which such information is available, stated separately for
- a) EELs comprised of analog loops that are connected to analog transport,
  - b) EELs comprised of analog loops that are multiplexed onto higher speed (DS-1 or higher) transport,
  - c) EELs comprised of DS-1 loops that are connected to DS-1 transport,
  - d) EELs comprised of DS-1 loops that are multiplexed onto DS-3 or higher transport, and
  - e) EELs comprised of analog loops that are multiplexed onto higher speed (DS-1 or higher) transport
- 60) For the last quarter for which such information is available, provide by end-office (by applicable CLLI code)
- a) The CLLI of the tandem switch on which the end-office homes
  - b) For the same period as the information provided in the previous question, please indicate whether you have enough end office and tandem switch ports available for each wire center to handle the traffic if all UNE-P lines were moved to CLEC switches?
- 61) Provide the number of EEL local connections, in DS-1 equivalents, by wire center for each quarter since the fourth quarter of 1999
- 62) For the most recent quarter available, provide the
- a) Number of business premises with a single analog line,
  - b) Number of business premises with two analog lines,
  - c) Number of business premises with three analog lines,
  - d) Number of business premises with four analog lines,
  - e) Number of business premises with five analog lines,
  - f) Number of business premises with six analog lines,
  - g) Number of business premises with seven analog lines,

- h) Number of business premises with eight analog lines,
- i) Number of business premises with nine analog lines,
- j) Number of business premises with ten analog lines,
- k) Number of business premises with eleven analog lines,
- l) Number of business premises with twelve analog lines,
- m) Number of business premises with thirteen analog lines,
- n) Number of business premises with fourteen analog lines,
- o) Number of business premises with fifteen analog lines,
- p) Number of business premises with sixteen analog lines,
- q) Number of business premises with seventeen analog lines,
- r) Number of business premises with eighteen analog lines,
- s) Number of business premises with nineteen analog lines,
- t) Number of business premises with twenty analog lines,
- u) Number of business premises with twenty-one analog lines,
- v) Number of business premises with twenty-two analog lines,
- w) Number of business premises with twenty-three analog lines,
- x) Number of business premises with twenty-four analog lines, and
- y) Number of business premises with more than twenty-four analog lines

63) For the last quarter for which such information is available, provide by end-office (by applicable CLLI code)

- a) The CLLI of the tandem switch on which the end-office homes
- b) The number of shared transport (i.e. transport used in conjunction with unbundled local switching) minutes originating from the end-office
- c) The number of shared transport minutes terminating to the end-office

- 64) For the same period as the information provided in the previous question, please provide
- a) The total number of interconnection trunks and interconnection minutes at each tandem, separated between
    - i) Originating trunks and the minutes carried by those trunks,
    - ii) Terminating trunks and the minutes carried by those trunks, and
    - iii) Two-ways trunks and the minutes carried by those trunks
  - b) The total number of interconnection trunks and interconnection minutes at each end-office (by applicable CLLI code), separated between
    - i) Originating trunks and the minutes carried by those trunks,
    - ii) Terminating trunks and the minutes carried by those trunks, and
    - iii) Two-ways trunks and the minutes carried by those trunks
  - c) The number of additional trunk terminations available on each tandem
  - d) The number of additional trunk terminations available on each end-office
- 65) Provide the number of loops, by calendar year and by central office (by applicable CLLI code), in BellSouth's nine-state region that are served by
- a) IDLC arrangements,
  - b) NGDLC arrangements,
  - c) UDLC arrangements, and
  - d) Of the IDLC loops, please state how many loops are transferable to universal digital loop carrier (UDLC) without additional construction

- 66) Provide a forecast for the next five years, or the longest available forecast if a five-year forecast is not available, identifying the number of loops in BellSouth's nine-state region that BellSouth intends to serve via
- a) IDLC loop arrangements, and
  - b) NGDLC loop arrangements
- 67) Provide the number, for the most recent time period for which data is available, of UNE loops served by IDLC and NGDLC arrangements that have been provided to a CLEC
- a) With unbundled local switching, and
  - b) Without unbundled local switching
- 68) Please state the applicable charges, if any, and the amount of time it takes to transfer a customer's IDLC loop to
- a) UDLC, and
  - b) spare copper
- 69) In BellSouth's nine-state region, please provide the current total number for BellSouth of
- a) Central Offices, and
  - b) Remote Terminals
- 70) During the past five years, has BellSouth ever added processor capacity or peripheral equipment to one or more of its local switches due to
- a) Increased usage, and
  - b) Exhaust of the number of end-user lines that could be connected to the switch?

- 71) If the answer to either part of Interrogatory No 70 above is yes, please identify
- a) The nature of the upgrade performed,
  - b) Whether BellSouth had other end-office switches within a 15-mile radius with capacity to handle additional lines,
  - c) If the answer to (b) is in the affirmative, state whether BellSouth considered off-loading subscriber lines from the switch requiring the upgrade, and serving those lines from a different local switch. If BellSouth did not consider doing so, why not?
- 72) What engineering guidelines and/or standards does BellSouth use to determine when, if ever, to serve customer lines from a switch other than the switch located at the customer's serving wire center?
- a) Under what conditions, if any, would BellSouth consider serving lines from a switch other than the one located in the customer's serving wire center?
- 73) Please describe BellSouth's Fill at Relief ("FAR") guidelines for switching
- 74) Does BellSouth currently provide any customer's local exchange service, other than for foreign exchange service, from a switch located at a place other than the customer's serving wire center? If yes, identify
- a) The wire centers and the number of affected lines at each of those wire centers
  - b) The circumstances that caused BellSouth to offer service in this manner
  - c) Any additional charges imposed on the customer for this serving configuration

- 75) In BellSouth's nine-state region, are BellSouth's Digital Loop Carriers ("DLC", DLC shall include UDLC, IDLC, and NGLDC) partitionable? In answering this question, please use the following definition of "partitionable" capable of terminating digital facilities from one or more carriers on the network side of the DLC to provide access to the analog loops (or subloops) on the subscriber side and providing an out of band GR303 or comparable control protocol enabling two or more carriers to independently control the subscriber-side functionality for subscriber's voice grade UNE analog loops (or subloops)
- a) If the answer to Interrogatory No 75 is "yes", please provide the terms, conditions, and rates, if any, that BellSouth offers or plans to offer for access to BellSouth's DLCs in BellSouth's nine-state region as described in the previous question
  - b) If the answer to Interrogatory No 75 is "no", please provide the following information
    - 1) Does BellSouth intend or plan to partition DLCs (as defined in Interrogatory No 75 in BellSouth's nine-state region?
- 76) If the answer to Interrogatory No 75 is "yes," then please state the anticipated time frame in which BellSouth will offer partitioned at wholesale its DLC in BellSouth's nine-state region
- 77) If the answer to Interrogatory No 75 is "no", please provide a detailed explanation of why BellSouth does not intend to partition its DLCs in BellSouth's nine-state region Please state any and all activities or steps that would be required in order for BellSouth to partition its DLCs in BellSouth's nine-state region
- 78) Are there any customers being served via UNE-P today that could not be serviced via UNE-L such as for reasons of no copper to replace UDLC, etc ?
- 79) Please state any alternatives available to competitive local exchange carriers ("CLECs") or any other carrier to provide analog service (defined as "plain old telephone service") over unbundled loops where the analog loop terminates to a remote terminal or other outside plant location (defined as other than the Central Office) in BellSouth's nine-state region

- 80) Please identify any technological or operational alternatives to DLC partitioning (as defined in Interrogatory No. 75) that are currently available to CLECs or other carriers in BellSouth's nine-state region
- 81) If BellSouth identified any alternatives in the previous Interrogatory No. 80, do any of the identified alternatives involve placement of CLEC-owned DLC equipment, or the functional equivalent to DLC equipment, in an ILEC-owned Remote Terminal? If the answer is yes, please provide all terms, conditions, and rates that BellSouth would charge for a carrier to place DLC equipment in its remote terminal
- 82) In BellSouth's nine-state region, please provide BellSouth's long-term projection (i.e., next 5 years) of the anticipated percentage of the analog loops identified in Interrogatory No. 75 that will terminate in the Central Office without passing through BellSouth's DLCs
- 83) In BellSouth's nine-state region, please identify, by name and location, any of BellSouth's Central Offices that do not have fiber connectivity for purposes of interoffice transport
- 84) Provide for the most recent calendar year for which such information is available, the total monthly recurring revenues received from collocation-based services (i.e., space charges, power charges, cabling, terminations/cross-connects, etc.) in that calendar year and the number of collocation arrangements in-service at the end of that year
- 85) Provide for each calendar year from 1999 through 2002 separately for each type of collocation (i.e., caged physical, cageless physical, virtual, other) the total square footage and number of collocations in BellSouth's nine-state region and the total annual revenue collected for each type of collocation
- 86) Describe all components of BellSouth's own physical network that are utilized to connect a loop to a BellSouth Class 5 or similar local switch that is located in the same central office as the end user being served. Please describe with specificity all restrictions on the type of equipment that can be placed in collocation space



- 87) Identify the number of BellSouth central offices in which more than one CLEC was collocated in BellSouth's nine-state region
- a) As of December 31, 1996,
  - b) As of December 31, 2000, and
  - c) As of March 31, 2003
- 88) In BellSouth's nine-state region, in BellSouth's Central Offices that currently have one or more collocators, please provide the following information for each of those central offices
- a) Name and location of the central office,
  - b) The exchange served by the central office,
  - c) The number of collocations by collocation type,
  - d) The total amount of space currently being used by collocators,
  - e) The total amount of space available for use by collocators (which does not include space reserved for your company or its affiliates),
  - f) Names of carriers currently occupying collocation space,
  - g) The date the carriers took occupancy,
  - h) Collocation space held by carriers who are currently in bankruptcy proceedings,
  - i) Collocation space occupied by CLECs no longer operating,
  - j) Whether the CO is manned or unmanned,
  - k) The number of cross-connects in service to the wire center, and
  - l) The number of UNE loops provisioned to each collocating carrier in the past 3 months

- 89) In BellSouth's nine-state region, identify the number of BellSouth's Central Offices in which there are no current collocation arrangements provided to CLECs. Of the number identified, please identify name and location of the central office, and state whether the CO is manned or unmanned.
- 90) In BellSouth's nine-state region, does BellSouth currently provide or intend to provide main distribution frame copper facility collocation that would provide CLECs with comparable access to BellSouth's analog loops?
- a) If the answer to this question is "yes," please provide the terms, conditions, and rates under which the collocation arrangement is provided or intended to be provided.
  - b) If the answer to this question is "no," please provide a detailed explanation to support your response.
- 91) What is the maximum number of collocators at each central office and each remote terminal?
- 92) For out-of-region long distance services provided to mass-market customers, specify how BellSouth obtains interexchange switching and transport capacity and the percentage of long distance services for interLATA voice mass-market customers that is provided using such non-BellSouth facilities.
- 93) What rate does BellSouth propose to charge to other carriers for access to de-listed local switching functionality?
- a) Explain the source of each difference between the proposed just and reasonable rate for de-listed local switching and the approved just and reasonable TELRIC rate.
  - b) Provide the new return-on-equity achieved by the proposed just and reasonable rate for de-listed local switching.

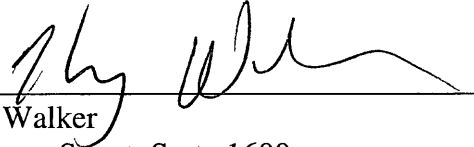
- 94) Has BellSouth ever considered leasing switching capacity from a third party to provide retail services
- a) Within its certificated incumbent territory (i.e., in-region)?
  - b) Outside its certificated incumbent territory (i.e., out-of-region)?
- 95) If the BellSouth is proposing a new rate for de-listed local switching with a higher allocation of joint and common costs than its cost-based rates, please provide for comparison
- a) Provide the current average per-minute revenue BellSouth derives from the sale of retail interLATA long distance service
  - b) Provide BellSouth's current average per-minute long distance network costs, net of access charges
- 96) What changes need to be made to the terms, conditions and rates (nonrecurring and monthly recurring) for BellSouth enhanced extended loop tariffs or product offerings to eliminate impairment?
- 97) How will CLECs be able to use BellSouth's loop plant to provide DSL/IP-based services?
- 98) What additional interconnection arrangements (including interconnection agreements or similar binding documents) need to be established or augmented to ensure call completion between all local exchange carriers (CLECs, SBC, Verizon, independent LECs, etc )?
- 99) How many mass-market long distance customers has BellSouth obtained in BellSouth's nine-state region by quarter since its entry to the State's interLATA long distance market? What percentage of those customers are also BellSouth local customers? Does BellSouth offer the same bundled local/long distance package throughout its service territory?

- 100) What period of time does BellSouth use to define a winback (and therefore churn)? How many mass-market local winbacks has BellSouth achieved in BellSouth's nine-state region by quarter since 1999? What percentage of those customers receive a bundle of services that include interLATA long distance service?
- 101) What limits, if any, are there on the number of PIC changes that can be completed in a single work day in BellSouth central offices?
- 102) Please state the total number of PIC changes BellSouth has performed in BellSouth's nine-state region for each month from January 1999 to present
- 103) Does BellSouth have pre-ordering and ordering processes that allow a CLEC to use one wholesale provider for switching and another for the loop, or otherwise uses multiple vendors in its service arrangement?
- 104) Please provide BellSouth's variable costs and marginal costs for local, long distance and broadband services individually and as part of a bundled offering
- 105) On an individual central office, end office, and serving wire center basis, please provide a) forecasts of demand for circuit switching and b) current capacity utilization for the major switch components, (i e , processors, line cards, trunk cards)
- 106) On an individual central office, end office, and serving wire center basis, please provide the recent history of line growth/line loss for a) primary voice lines, b) additional voice lines, c) broadband/data lines
- 107) Provide expected wholesale demand for a) UNE loops, b) UNE-P, and c) resale

- 108) Identify and describe any constraints (if any) on BellSouth's ability to a) reduce prices in relation to some measure of cost (e g , price floor based on TELRIC), b) target price reductions to geographic areas, and c) target price reductions to types of customers (including individual customers)
- 109) Please provide BellSouth's current and planned bundling of local voice service, long distance voice service and/or data/broadband Internet access
- 110) On a wire center basis, please provide average local revenue per small business line and average local revenue per residential line Please provide average "take rate" for vertical features
- 111) Please provide disaggregated revenue data (residential, small business, large business, etc ) specific to the geographies that BellSouth claims are markets for impairment analysis purposes
- 112) Please provide, by central office, by month, for the past 12 months, the following information for BellSouth's nine-state region
- a % of originating calls which are intra switch,
  - b % of originating calls which are inter-switch - local,
  - c % of originating calls intra-LATA long distance,
  - d % of originating calls inter-LATA intrastate, and
  - e % of originating calls inter-LATA interstate

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

A handwritten signature in black ink, appearing to read "Henry Walker", written over a horizontal line.

Henry Walker  
414 Union Street, Suite 1600  
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(615) 252-2363

A handwritten signature in black ink, appearing to read "Martha Ross-Bain by personal", written over a horizontal line.

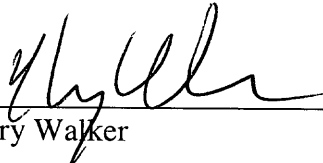
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### CERTIFICATE OF SERVICE

I hereby certify that on October 27, 2003, a copy of the foregoing document was served on the parties of record, via US mail

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Henry Walker